

AMENDMENT UNDER 37 C.F.R. §1.111  
U.S. Patent Application No. 10/728,982

Attorney Docket No. Q78732

**AMENDMENTS TO THE DRAWINGS**

The attached sheets of drawings improve the clarity of FIG. 4. This change is not made in response to any rejection in the Office Action mailed April 5, 2006.

Attachments: One (1) Annotated Marked-up Drawing (FIGs. 3 and 4)  
One (1) Replacement Sheet (FIGs. 3 and 4)

**REMARKS**

Applicants submit this Amendment in reply to the Office Action mailed April 5, 2006.

In the Amendment, Applicants amend the specification and FIG. 4 to improve clarity.

No amendments are made in response to the Examiner's rejections.

Before entry of the Amendment, claims 1-8 and 11-16 were pending in this application.

After entry of the Amendment, claims 1-8 and 11-16 remain pending in the application.

The originally filed specification, claims, Abstract of the Disclosure, and drawings fully support the amendments to the specification and FIG. 4. No new matter is introduced.

In the Office Action, the Examiner rejected claims 1-5, 8, 11-13, and 16 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 4,937,825 to Ballard et al. ("Ballard") in view of U.S. Patent No. 5,592,628 to Ueno et al. ("Ueno"); and rejected claims 6, 7, 14, and 15 under 35 U.S.C. § 103(a) as being unpatentable over Ballard in view of Ueno, and further in view of U.S. Patent Application Publication No. 2003/0229827 A1 to Dun et al. ("Dun").

Applicants respectfully traverse the Examiner's rejections.

**Ballard, Ueno, and Dun**

The Examiner cites Fig. 1 and c.10/ll. 25-50 of Ballard as disclosing that the specific module LCCM "provides a specific (transmission) protocol to the generic module LCSM". Office Action, p. 2/§ 4. Applicants note, however, that the cited passage in Ballard specifically states "[a]ny product unique commands, protocols or requirements are generated by the LCSM 3 in response to the information it receives regarding the physical configuration of the link from

the LCCM 4”. Ballard, c. 10/11. 40-44 (emphases added). Thus, Applicants submit that the cited passage does not support the recitation “said at least one specific module provides a transmission protocol specific to said integrated-circuit-environment to said generic module”, as recited in claims 1 and 8 (emphases added), or the recitation “a second specific module of the computer program product provides a transmission protocol used by said second generic module to interface with said integrated-circuit-environment”, as recited in claim 16 (emphasis added). Applicants further note that the Examiner has not even attempted to argue that either Ueno or Dun supports either of those recitations.

Additionally, Applicants note that Ballard discloses diagnosing problems in data communication networks in which “the data communication network devices operate under differing protocols, are supplied by different vendors and have differing diagnostic or data providing capabilities.” Ballard, c. 1/11. 26-29. Thus, the data communication networks of Ballard are constructed of “multiple layers of various vendors’ physical devices having diverse capabilities and communication protocols.” Id., c. 1/11. 54-56. Applicants submit that this type of data communication network is significantly different than the integrated-circuit-environment of the present invention. And the Examiner appears to have effectively admitted that this difference exists in section 4 on page 3 of the Office Action mailed April 5, 2006.

In sharp contrast, Applicants note that the disclosure of Ueno appears to be limited to a particular data communication system designed to guarantee at a transmission station the arrival of transmitted data to a receiving station. Given this narrow disclosure (which also appears to be significantly different than that of Ballard), Applicants submit that one of ordinary skill in the art

would not be motivated to combine Ballard and Ueno in a manner resulting in the present invention.

Claim Rejection Under 35 U.S.C. § 103(a)—Independent Claim 1

Claim 1 recites, inter alia, “at least one generic module”, “at least one specific module”, “wherein said computer program product interfaces with a processor of said integrated-circuit-environment via said at least one generic module”, and “said at least one specific module provides a transmission protocol specific to said integrated-circuit-environment to said generic module”. As discussed above, the cited passage of Ballard does not support the recitation “said at least one specific module provides a transmission protocol specific to said integrated-circuit-environment to said generic module”, nor does either Ueno or Dun overcome this deficiency of Ballard.

Because a prima facie case of obviousness using multiple references requires that the references, when combined, teach or suggest all the claim limitations [see MPEP 2143.03 (8<sup>th</sup> ed., Rev. 3, Aug. 2005)], Applicants submit that claim 1 is patentable under 35 U.S.C. § 103(a) over the cited references, including Ballard, Ueno, Dun, and the other art of record.

In addition, because a prima facie case of obviousness using multiple references requires that there be some teaching, suggestion, or motivation to combine the references found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art [see MPEP 2143.01 (8<sup>th</sup> ed., Rev. 3, Aug. 2005)], and because the teaching or suggestion to make the claimed combination must be found in the prior art, not in Applicants’ disclosure [see MPEP 2143 (8<sup>th</sup> ed., Rev. 3, Aug. 2005)], Applicants submit that

claim 1 is patentable under 35 U.S.C. § 103(a) over the cited references, including Ballard, Ueno, Dun, and the other art of record, for at least this additional, independent reason.

Claim Rejection Under 35 U.S.C. § 103(a)—Dependent Claims 2-7

Applicants submit that dependent claims 2-7 are patentable under 35 U.S.C. § 103(a) over the cited references, including Ballard, Ueno, Dun, and the other art of record, at least due to the direct or indirect dependency of claims 2-7 from independent claim 1.

Claim Rejection Under 35 U.S.C. § 103(a)—Independent Claim 8

Claim 8 recites, inter alia, “at least one generic module”, “at least one specific module”, “wherein said computer executes said computer program product to interface with a processor of said integrated-circuit-environment via said at least one generic module”, and “said at least one specific module provides a transmission protocol specific to said integrated-circuit-environment to said generic module”. As discussed above, the cited passage of Ballard does not support the recitation “said at least one specific module provides a transmission protocol specific to said integrated-circuit-environment to said generic module”, nor does either Ueno or Dun overcome this deficiency of Ballard.

And, as discussed above, because a prima facie case of obviousness using multiple references requires that the references, when combined, teach or suggest all the claim limitations [see MPEP 2143.03 (8<sup>th</sup> ed., Rev. 3, Aug. 2005)], Applicants submit that claim 8 is patentable under 35 U.S.C. § 103(a) over the cited references, including Ballard, Ueno, Dun, and the other art of record.

Also, as discussed above, because a prima facie case of obviousness using multiple references requires that there be some teaching, suggestion, or motivation to combine the references found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art [see MPEP 2143.01 (8<sup>th</sup> ed., Rev. 3, Aug. 2005)], and because the teaching or suggestion to make the claimed combination must be found in the prior art, not in Applicants' disclosure [see MPEP 2143 (8<sup>th</sup> ed., Rev. 3, Aug. 2005)], Applicants submit that claim 8 is patentable under 35 U.S.C. § 103(a) over the cited references, including Ballard, Ueno, Dun, and the other art of record, for at least this additional, independent reason.

Claim Rejection Under 35 U.S.C. § 103(a)—Dependent Claims 11-15

Applicants submit that dependent claims 11-15 are patentable under 35 U.S.C. § 103(a) over the cited references, including Ballard, Ueno, Dun, and the other art of record, at least due to the direct or indirect dependency of claims 11-15 from independent claim 8.

Claim Rejection Under 35 U.S.C. § 103(a)—Independent Claim 16

Claim 16 recites, inter alia, “generating traffic signals that are sent to said integrated-circuit-environment”, “wherein a first generic module of a computer program product is used to interface with an input of said integrated-circuit-environment”, “a first specific module of the computer program product provides a transmission protocol used by said first generic module to interface with said integrated-circuit-environment”, “analyzing traffic signals that are sent to said computer program product from said integrated-circuit-environment”, “wherein a second generic module of the computer program product is used to interface with the output of said integrated-

circuit-environment”, and “a second specific module of the computer program product provides a transmission protocol used by said second generic module to interface with said integrated-circuit-environment”. As discussed above, the cited passage of Ballard does not support the recitation “a second specific module of the computer program product provides a transmission protocol used by said second generic module to interface with said integrated-circuit-environment”, nor does either Ueno or Dun overcome this deficiency of Ballard.

And, as discussed above, because a prima facie case of obviousness using multiple references requires that the references, when combined, teach or suggest all the claim limitations [see MPEP 2143.03 (8<sup>th</sup> ed., Rev. 3, Aug. 2005)], Applicants submit that claim 16 is patentable under 35 U.S.C. § 103(a) over the cited references, including Ballard, Ueno, Dun, and the other art of record.

Also, as discussed above, because a prima facie case of obviousness using multiple references requires that there be some teaching, suggestion, or motivation to combine the references found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art [see MPEP 2143.01 (8<sup>th</sup> ed., Rev. 3, Aug. 2005)], and because the teaching or suggestion to make the claimed combination must be found in the prior art, not in Applicants’ disclosure [see MPEP 2143 (8<sup>th</sup> ed., Rev. 3, Aug. 2005)], Applicants submit that claim 16 is patentable under 35 U.S.C. § 103(a) over the cited references, including Ballard, Ueno, Dun, and the other art of record, for at least this additional, independent reason.

Request for Reconsideration and Allowance

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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